

REMARKS

It is suggested that Rathburn is the portion of the specification not originally relied on does teach an S-shaped spring 154b, referring to Figure 10B. While this is true, it is seen from the corresponding material in the specification and the drawing of Figure 10A that Figure 10A and the structure with the S-shaped spring 154b is meant to replace the spring 154 in Figure 8A. There, it can be seen that the contact with the land 152 is an aligned or centered contact. Thus, the embodiment shown in Figures 10A, 10B, and 8A are inconsistent with the embodiment originally relied on in Figure 2A. Figure 2A shows an off centered arrangement and suggests using a non-S-shaped spring. Figure 8A and Figure 10B suggest creating a centered contact with an S-shaped spring. This teaches away from the claimed invention, not toward it.

Reconsideration of any rejection based on Rathburn is, therefore, no longer appropriate.

With respect to the combination including Hornchek, the Examiner suggests that what is shown there are spring contacts. But, even if that were so, they are not S-shaped spring contacts. Moreover, they are incompatible with the use of S-shaped spring contacts in view of the long, thin openings provided for them. In order to provide S-shaped contacts would require substantial re-engineering of the structure. Moreover, Hornchek teaches the situation where the contacts 124 make centered alignment with the solder balls 126a. Again, teaching away from the claimed invention.

With respect to the argument based on Higashi, it is clear from Figures 5, 6, and 10 that either aligned contact is made, as in the case of Figure 5, or poking alignment is made in the case of Figure 6, without any type of wiping arrangement.

Therefore, neither reference, nor their combination, teaches the claimed invention.

The suggestion that the change of shape cannot be patentable is, of course, contrary to over 50 years of patent law. Everything is ultimately a change of shape.

The problem with using hindsight reasoning in the present case is that there is nothing in any of the references to suggest the claimed combination. Thus, the type of hindsight reasoning here is an attempt, without any guidance within the references, to reconstruct something that is not taught in any of the references.

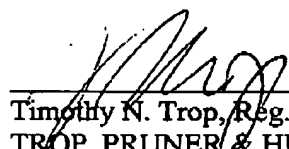
Therefore, a *prima facie* rejection is not made out.

With respect to Figure 10 of Higashi, it is noted that it does show non-central alignment between the contact and the solder ball. But it does not show wiping contact. Instead, it shows jabbing, scratching contact, not the wiping contact claimed. The claims clearly call for both wiping contact and non-central contact. To modify the reference to do this, the poking, jabbing contact that is alleged to be S-shaped would have to hit on the right side of the solder ball off centered, not on the left side. Alternatively, a reverse S-shape could be used and hit on the side as shown. However, as depicted, non-wiping contact is described, teaching away from the claimed invention.

Therefore, reconsideration is requested.

Respectfully submitted,

Date: August 21, 2006



Timothy N. Trop, Reg. No. 28,994
TROP, PRUNER & HU, P.C.
1616 South Voss Road, Suite 750
Houston, TX 77057-2631
713/468-8880 [Phone]
713/468-8883 [Fax]

Attorneys for Intel Corporation